

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

DAVID P. DONOVAN

Plaintiff,

v.

BETH A. WILKINSON

Defendant,

PRO-FOOTBALL, INC.

Intervenor.

Civil Action No. 1:20-cv-01344 (AJT/IDD)

**JOINT CONSENT MOTION TO CONTINUE THE HEARING ON THE
WP COMPANY LLC'S MOTION TO INTERVENE**

Intervenor Pro-Football, Inc., d/b/a the Washington Football Team and Defendant Beth Wilkinson, with the consent and agreement of Plaintiff David Donovan and WP Company LLC d/b/a The Washington Post (the "Post"), pursuant to Local Civil Rule 7 hereby request that the Court continue the hearing currently set for Friday, January 29, 2021 at 10:00 am one week and reschedule it for Friday, February 5, 2021, or at a time convenient for the Court.

In support of this motion, the Team and Defendant state as follows:

1. On December 17, 2020, the Post filed a Motion to Intervene for the Limited Purpose of Asserting the Public Interest in Access to Judicial Records (the "Motion"). [ECF 98.] The Motion was set for a hearing before Magistrate Judge Ivan D. Davis on Friday, January 29, 2021. [Dkt. Entry dated 12/21/2020.]

2. On January 8, 2021, Judge Davis held a hearing on the Team's Motion to Seal, Strike, and Reconsider in Part. [ECF 145.] In an order dated January 8, 2021, Judge Davis

granted in part and denied in part the Team's motion. [ECF 147.] The order directed the parties—Plaintiff, Defendant, and the Team, to confer and submit by January 15, 2021 a new set of proposed redactions to the filings subject to sealing based on the Court's guidance during the January 8th Zoom hearing and the Court's Order of November 25, 2020 [ECF 68]. [ECF 147.]

3. On January 14, 2021, the parties submitted under seal revised proposed redactions for the Court's consideration. [ECF 154 & 154-1.]

3. On January 19, 2021, the parties were contacted by Judge Davis' law clerk and directed to further revise the proposed redactions.

4. The parties are continuing to work through revised proposed redactions to submit to the Court for a determination of the information to be unsealed from the docket.

5. There is good cause to grant this short continuance, as the parties expect to be able to submit finalized redacted documents to be unsealed on the public docket in the interim. The short delay will not prejudice the Post, as the Post itself seeks such relief: public access to documents currently filed under seal in this action. Moreover, allowing the parties to submit their revised proposed redactions (and thereby allowing the Court to determine what records remain under seal) before hearing the Post's motion will allow the Court to have a complete record as to the precise records to which the Post continues to seek access.

6. In addition, on January 27, 2021, the Post filed a letter in further support of its Motion to inform the Court of recently decided caselaw. [ECF 158 & 158-1.] Continuing the hearing by one week provides additional time for the Court and the parties to review this newly submitted authority.

7. Accordingly, Intervenor and Defendant respectfully request, with the consent and agreement of Plaintiff and the Post, that the Court continue the currently set hearing on the Post's Motion to Intervene to Friday, February 5, 2021.

A proposed order is filed herewith.

**THE PARTIES CONSENT TO SUBMISSION OF THIS MOTION
TO THE COURT WITHOUT A HEARING.**

Dated: January 28, 2021
Washington, D.C.

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of January, 2021, a true and correct copy of the foregoing *Joint Consent Motion to Continue the Hearing on the WP Company LLC's Motion to Intervene* was filed with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ Christina Guerola Sarchio
Christina Guerola Sarchio